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*Attorneys for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

NEETA THAKUR, KEN ALEX, NELL  
 GREEN NYLEN, ROBERT HIRST,  
 CHRISTINE PHILLIOU, and JEDDA  
 FOREMAN, on behalf of themselves and all  
 others similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
 President of the United States;  
 DEPARTMENT OF GOVERNMENT  
 EFFICIENCY (“DOGE”);  
 AMY GLEASON, in her official capacity as  
 Acting Administrator of the Department of  
 Government Efficiency;  
 NATIONAL SCIENCE FOUNDATION;  
 BRIAN STONE, in his official capacity as

Case No. 3:25-cv-4737

**DECLARATION OF ELIZABETH J.  
 CABRASER IN SUPPORT OF  
 MOTION FOR PRELIMINARY  
 INJUNCTION AND PROVISIONAL  
 CLASS CERTIFICATION AS TO  
 ADDITIONAL AGENCY  
 DEFENDANTS**

1 Acting Director of the National Science  
Foundation;  
2 NATIONAL ENDOWMENT FOR THE  
HUMANITIES;  
3 MICHAEL MCDONALD, in his official  
capacity as Acting Chairman of the National  
4 Endowment for the Humanities;  
UNITED STATES ENVIRONMENTAL  
5 PROTECTION AGENCY;  
LEE ZELDIN, in his official capacity as  
6 Administrator of the U.S. Environmental  
Protection Agency;  
7 UNITED STATES DEPARTMENT OF  
AGRICULTURE;  
8 BROOKE ROLLINS, in her official capacity as  
Secretary of the U.S. Department of Agriculture;  
9 AMERICORPS (a.k.a. the CORPORATION  
FOR NATIONAL AND COMMUNITY  
10 SERVICE);  
JENNIFER BASTRESS TAHMASEBI, in her  
11 official capacity as Interim Agency Head of  
AmeriCorps;  
12 UNITED STATES DEPARTMENT OF  
DEFENSE;  
13 PETE HEGSETH, in his official capacity as  
Secretary of the U.S. Department of Defense;  
14 UNITED STATES DEPARTMENT OF  
EDUCATION;  
15 LINDA MCMAHON, in her official capacity as  
Secretary of the U.S. Department of Education;  
16 UNITED STATES DEPARTMENT OF  
ENERGY;  
17 CHRIS WRIGHT, in his official capacity as  
Secretary of Energy;  
18 UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES;  
19 ROBERT F. KENNEDY, JR., in his official  
capacity as Secretary of the U.S. Department of  
20 Health and Human Services;  
UNITED STATES CENTERS FOR DISEASE  
21 CONTROL;  
MATTHEW BUZZELLI, in his official capacity  
22 as Acting Director of the Centers for Disease  
Control;  
23 UNITED STATES FOOD AND DRUG  
ADMINISTRATION;  
24 MARTIN A. MAKARY, in his official capacity  
as Commissioner of the Food and Drug  
25 Administration;  
UNITED STATES NATIONAL INSTITUTES  
26 OF HEALTH;  
JAYANTA BHATTACHARYA, in his official  
27 capacity as Director of the National Institutes of  
Health;  
28

1 INSTITUTE OF MUSEUM AND LIBRARY  
 2 SERVICES;  
 3 KEITH SONDERLING, in his official capacity  
 4 as Acting Director of the Institute of Museum  
 5 and Library Services;  
 6 UNITED STATES DEPARTMENT OF THE  
 7 INTERIOR;  
 8 DOUG BURGUM, in his official capacity as  
 9 Secretary of the Interior;  
 10 UNITED STATES DEPARTMENT OF STATE;  
 11 MARCO RUBIO, in his official capacity as  
 12 Secretary of the U.S. Department of State;  
 13 DEPARTMENT OF TRANSPORTATION;  
 14 SEAN DUFFY, in his official capacity as  
 15 Secretary for the U.S. Department of  
 16 Transportation,  
 17  
 18 Defendants.

11 I, Elizabeth J. Cabraser, declare as follows:

12 1. I am an attorney admitted to practice in the state of California. I am a partner of  
 13 Lieff Cabraser Heimann & Bernstein LLP (“LCHB”). I respectfully submit this declaration in  
 14 support of Plaintiffs’ Motion For Preliminary Injunction And Provisional Class Certification As  
 15 To Additional Agency Defendants. I have personal knowledge of the facts set forth in this  
 16 declaration, and could testify competently to them if called upon to do so.

17 2. On July 25, 2025, Defendants produced documents to Plaintiffs related to grant  
 18 terminations made by the U.S. Department of Defense (“DOD”) and the U.S. Department of  
 19 Transportation (“DOT”) in response to the Court’s Discovery Order, ECF 60.

20 3. For the Department of Transportation, Defendants produced:

- 21 a. a three-page declaration;
- 22 b. Plaintiff Susan Handy’s termination letters;
- 23 c. two executive orders;
- 24 d. three agency memoranda.

25 4. For the Department of Defense, Defendants produced:

- 26 a. a two-page declaration;
- 27 b. Plaintiff Eli Berman’s termination letter;
- 28

- c. one other termination letter;
- d. two executive orders;
- e. three agency memoranda;
- f. six spreadsheets;
- g. internal agency correspondence.

5. Attached as **Exhibit A** is a true and correct copy of the Declaration of Zach Young, Senior Advisor to the Secretary of DOT.

6. Attached as **Exhibit B** is a true and correct copy of all documents produced by Defendants for DOT.

7. Attached as **Exhibit C** is a true and correct copy of the Declaration of Jason I. Day, Research Policy Director for the Office of the Under Secretary of Defense for Research and Engineering (OUSD(R&E)) at DOD.

8. Attached as **Exhibit D** is a true and correct copy of non-confidential documents produced by Defendants for DOD.

9. Attached as **Exhibit E** is a true and correct copy of an extract of data taken from spreadsheets produced by the Defendants for DOD.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed this 1st day of August, 2025, in San Francisco.

/s/Elizabeth Cabraser

Elizabeth Cabraser